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Attorneys for Defendant,  
STEWART TITLE GUARANTY COMPANY

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

\* \* \*

THE BANK OF NEW YORK MELLON  
F/K/A THE BANK OF NEW YORK AS  
SUCCESSOR TO JP MORGAN CHASE  
BANK, NOT INDIVIDUALLY BUT  
SOLELY AS TRUSTEE FOR THE HOLDER  
OF THE BEAR STEARNS ALT-A TRUST  
2004-11, MORTGAGE PASS-THROUGH  
CERTIFICATES, SERIES 2004-11,

Plaintiff,

vs.

STEWART INFORMATION SERVICES,  
CORP.; STEWART TITLE GUARANTY  
COMPANY; DOE INDIVIDUALS I through  
X; and ROE CORPORATIONS XI through  
XX, inclusive,

Defendants.

CASE NO. 2:21-cv-01492-RFB-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO FILE  
REPLY IN SUPPORT OF MOTION  
TO DISMISS [ECF NO. 6]**

**[First Request]**

Defendant, Stewart Title Guaranty Company (“STCG” or “Defendant”), by and through its counsel of record, MAURICE WOOD, and Plaintiff, The Bank of New York Mellon F/K/A the Bank of New York as Successor to JP Morgan Chase Bank, not individually but solely as trustee for the holder of the Bear Stearns ALT-A Trust 2004-11, Mortgage Pass-Through Certificates, Series 2004-11’s (“Plaintiff”), by and through its counsel of record, WRIGHT FINLAY & ZAK, hereby stipulate and agree as follows:

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1           1.       On July 15, 2021, Plaintiff filed its Complaint in the Eighth Judicial District Court,  
 2 Case No. Case No. A-21-837949-C. See ECF No. 1-1.

3           2.       On August 11, 2021, STGC and Stewart Information Services Corporation  
 4 (“SISC”) filed a Petition for Removal with this Court, based upon diversity jurisdiction. See ECF  
 5 No. 1.

6           3.       On August 18, 2021, SISC filed a Motion to Dismiss for Lack of Personal  
 7 Jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2). See ECF No. 5.

8           4.       On August 18, 2021, STGC filed a Motion to Dismiss Pursuant to Fed. R. Civ. P.  
 9 12(b)(6). See EFC No. 6.

10          5.       On September 1, 2021, the parties stipulated to extend the deadline for Plaintiff to  
 11 respond to the Motions to Dismiss until September 8, 2021, which was subsequently granted by  
 12 this Court. See ECF Nos. 8, 11.

13          6.       On September 8, 2021, Plaintiff filed an unopposed Motion to extend the deadline  
 14 for Plaintiff to respond to the Motions to Dismiss until September 9, 2021, which was subsequently  
 15 granted by this Court. See ECF No. 12, 18.

16          7.       On September 9, 2021, Plaintiff filed its Responses in Opposition to the two  
 17 Motions to Dismiss, with an accompanying Request for Judicial Notice. See ECF Nos. 13-15.

18          8.       The timing of Plaintiff’s filing of the Responses created a scheduling conflict for  
 19 Defendant’s counsel due to Defendant’s counsels’ prior professional and family commitments.

20          9.       As such, the parties have stipulated that the deadline for the filing of STGC’s Reply  
 21 will be extended to October 1, 2021.

22          10.       This extension is requested to allow counsel for Defendants additional time to  
 23 review and respond to the points and authorities filed by Plaintiff while still allowing Defendant’s  
 24 counsel to comply with her previously planned commitments.

25          11.       Counsel for Plaintiff does not oppose the requested extension.

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12. This is the first request for an extension which is brought in good faith and not for purposes of delay.

DATED this 14<sup>th</sup> day of September, 2021.

DATED this 14<sup>th</sup> day of September, 2021.

**MAURICE WOOD**

**WRIGHT FINLAY & ZAK, LLP**

By: /s/ Brittany Wood

By: /s/ Darren T. Brenner

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*Attorneys for Defendants*

*Attorneys for Plaintiff*

IT IS SO ORDERED.

  
**RICHARD E. BOULWARE, II**  
**United States District Court**

DATED this 15th day of September, 2021.

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